

**Tschirhart Broadcasting, Inc.**

7439 Alverstone Way  
San Antonio, Texas 78250

(512) 681-7041 FCC MAIL SECTION

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Office of the Secretary

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March 7, 1991

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Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
Washington, DC 20554

RE: RM-7610 ✓

Dear Ms. Searcy:

Enclosed in an original and 9 copies of COMMENTS, sufficient for distribution to Commissioners, in response to a Commission Public Notice issued on February 7, 1991. This Public Notice, RM-7610, sought comments regarding a request for Rulemaking to establish aviation receiver standards. These comments address that issue.

Respectfully Submitted,

*Larry S. Tschirhart*

Larry S. Tschirhart  
President

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FCC MAIL SECTION

MAR - 8 1991

BEFORE THE

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

Federal Communications Commission  
Office of the Secretary

In the Matter of )  
 )  
Comments in Support of )  
Rulemaking Petition RM-7610 )

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RM- 7610 ✓

COMMENTS

On February 7, 1991, the FCC issued a Public Notice requesting comments on RM-7610. Tschirhart Broadcasting, Inc. (Tschirhart) hereby submits comments in support of the Petition for Rulemaking referred to in RM-7610.

RM-7610 was issued in response to a Petition for Rulemaking filed by John Furr and Associates, Inc., seeking a Rulemaking proceeding to establish standards for aviation receivers.

Tschirhart wholeheartedly supports a Rulemaking proceeding to establish these aviation receiver standards. In support of this position, Tschirhart submits the following:

1) This is definitely an issue of public safety. The Commission has, in the past, been reluctant to set standards for receivers. Instead the Commission has regulated the spectrum. The public safety in this instance dictates the establishment of receiver standards. Millions of people travel by air each year, all of whom depend upon one or more types of aviation receivers.

2) The FAA's strategy of attempting to control the spectrum, instead of the receivers, wholly ignores the effect on aircraft flying from U.S. airports to foreign destinations. Inferior receivers will place travelers at risk in areas outside the control of the FAA even if the FAA succeeded in curtailing ALL broadcast service in the U.S. Establishing minimum receiver standards which take into account the present RF environment, will better protect the public safety.

3) The third order intermodulation which is the main cause of concern, is a RECEIVER INDUCED problem. This third order intermodulation is NOT a result of a poorly designed or constructed broadcast transmitter, but it IS the result of a poorly designed or constructed aviation receiver.

4) The FAA intermodulation computer program DOES NOT consider presently available high quality receivers. It only considers the 3 WORST receivers in use, many of which are old and constructed with outdated technology, when determining "potential interference". For this reason, the FAA model shows "interference" at almost all major airports while there have never been any accidents attributed in whole or in part to this supposed "interference". There exists no evidence that the high quality receivers used by airliners experience any significant problems in the current RF environment. This indicates that high quality receivers are available using present technology. Most of the

older, inferior receivers can be upgraded to work satisfactorily in the present RF environment with relatively inexpensive, simple filters installed in the coax line between the receive antenna and the receiver. We believe that public safety will be best served by setting minimum receiver standards so as to remove from service, or to force the upgrade of, these inferior receivers which are potential hazards.

5) By establishing minimum aviation receiver standards which meet the challenge of the current high-powered RF environment (basically standards matching those of the high quality receivers already available), the FCC can greatly enhance public safety by removing the inferior receivers from service (or forcing their upgrade with filters).

Tschirhart Broadcasting hereby respectfully submits these comments to the Public Notice in RM-7610.

Respectfully Submitted,  
*L. S. Tschirhart* 3-7-91  
Larry S. Tschirhart  
President  
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San Antonio, TX 78250